

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

WILMA BROWN, on behalf of the)
HENNY PENNY CORPORATION)
EMPLOYEE STOCK OWNERSHIP)
PLAN, and on behalf of a class of all)
other persons similarly situated)
) No. 3:17-cv-00250-WHR
Plaintiff,)
)
v.)
)
WILMINGTON TRUST, N.A., as successor)
to Wilmington Trust Retirement and)
Institutional Services Company,)
)
Defendant.)
_____)

UNOPPOSED MOTION FOR EXTENSION OF DEADLINES

Defendant Wilmington Trust, N.A. hereby moves for an extension of deadlines in response to Plaintiff's Complaint filed July 27, 2017, for the reasons set forth in Defendant's memorandum in support of this Motion. A proposed order is attached.

Respectfully submitted,

/s/ Caroline Gentry

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Attorney for Defendant

MEMORANDUM

Defendant Wilmington Trust, N.A. (“Wilmington Trust”), by and through its counsel, respectfully moves for an extension of time to file a motion or pleading in response to Plaintiff’s Complaint. The Complaint was filed on July 27, 2017, and Defendant was served on July 31, 2017. Dkt. Nos. 1, 3. Defendant’s motion or responsive pleading is due August 21, 2017. Dkt. No. 3. Defendant has consulted with Plaintiff’s counsel and the parties have agreed to an extension of this and other deadlines, pursuant to S.D. Ohio Rule 7.3, as follows:

- Defendant’s motion or pleading in response to the Complaint to be filed by October 6, 2017.
- Plaintiff’s brief in opposition to Defendant’s motion to be filed by November 17, 2017.
- Defendant’s reply brief to be filed by December 8, 2017.

WHEREFORE, Defendant respectfully asks that the Court extend the deadline for Defendant to file a motion or pleading in response to the Complaint to October 6, 2017, and impose deadlines of November 17, 2017 for Plaintiff’s brief in opposition to Defendant’s motion, and December 8, 2017 for Defendant’s reply brief. A proposed order is attached.

Dated: August 18, 2017

/s/ Caroline Gentry

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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2017, a true and correct copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF DEADLINES** was served on the following counsel of record for Plaintiff via electronic mail:

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